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Guy M. Hicks
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T.R.A. DOCKET ROOM
September 3, 2004

615 214 6301
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VIA HAND DELIVERY

Hon. Pat Miller, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

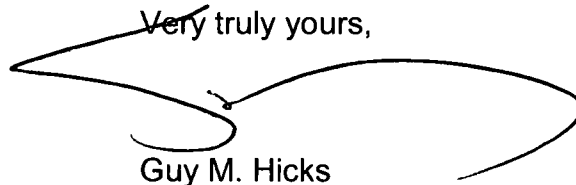
Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Chairman Miller:

Consistent with the terms of the Settlement Agreement relating to performance measurements approved by the Authority in this proceeding, BellSouth is filing fifteen copies of a Notification Report for the October 2004 data month and a Preliminary Notification Report for the data month of November 2004.¹ These Reports are being filed for informational purposes with all of the state public service commissions in BellSouth's nine-state region.

Copies of the enclosed are being provided to counsel of record. Thank you for your assistance in this regard.

Very truly yours,



Guy M. Hicks

GMH:ch

¹ The reference to a Preliminary Notification Report for the data month of December 2004 in the attached cover letter to the Georgia Public Service Commission is a typographical error



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September 1, 2004

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *Performance Measurements for Telecommunications Interconnection, Unbundling
and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the October 2004 data month and a Preliminary Notification Report for the data month of December 2004. These proposed changes will be discussed at the September 8, 2004 industry conference call.

There is one additional item that BellSouth would like to bring to the attention of the Commission and the parties. In its May 3, 2004 letter to this Commission, BellSouth provided notice that the problem classifying ADSL products would be implemented with April 2004 data. This change (Item 5 on the February 2004 Data Notification list) was made for all states except Tennessee, which was implemented with July 2004 data.

Enclosed herein, please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,


Lisa S. Foshee

LSF:nvd
Enclosures

Mr. Reece McAlister
September 1, 2004
Page 2

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Mr. Patrick Reinhardt (w/enclosure) (via electronic mail)
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549057/549060/549061

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PROPOSED OCTOBER 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the October 2004 data month. Results for the October 2004 data month will be posted as follows:

Preliminary results November 22, 2004
Final results November 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) *Affected Measures:* O-7, O-8, O-9 & O-11

Description of Change: Currently, when a non-mechanized LSR is received with an inbound timestamp in eastern time and the outbound timestamp is in central time, PMAP is miscounting the duration as either a negative duration or a duration that is one hour less than the actual duration. BellSouth proposes to update PMAP code to normalize all inbound timestamps to central time. This proposed change was Item (1) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5601)

Impact of Change: For May 2004, in Georgia, for O-11, 2 of 5801 (0.03%) non-mechanized LSRs with a negative interval were reported as misses. For O-9, 3 of 3510 (0.09%) non-mechanized LSRs were reported as met but should have been reported as misses.

Provisioning Measurements

- (2) *Affected Measures:* P-11 (Florida, Georgia, Kentucky, and Tennessee)

Description of Change: Currently, BellSouth is incorrectly omitting UNE ISDN PRI Ports from this measure. BellSouth proposes to correct this problem by adding the UNE ISDN PRI Port product to the UNE disaggregation. This proposed change was Item (2) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5333)

Impact of Change: No orders were received from January 2004 - May 2004 data, therefore, no records exist.

- (3) *Affected Measures:* P-11 (Florida, Georgia, Kentucky, and Tennessee)

Description of Change: Currently, BellSouth is excluding CLEC initiated denial and restoral orders from the Mechanized SOA measure. BellSouth proposes to include these orders in the measure. This proposed change was Item (3) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5499)

Impact of Change: For April 2004, the regional result for the UNE-P disaggregation would change from 97.51% to 97.53%, (.02%). For the same month, the result for Resale would change from 96.29% to 96.37% (.08%).

- (4) *Affected Measures:* P-13, P-13B, P-13C & P-13D

Description of Change: Currently, BellSouth is manually loading data for the LNP measures into the warehouse. With the implementation of a recent Encore Release, the data can now be produced via mechanization. BellSouth proposes to migrate the LNP measures into the warehouse and produce them mechanically. This proposed change was Item (4) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5533)

Impact of Change: None.

- (5) *Affected Measures:* P-1, P-2B/P-2, P-3, P-4A/P-4, P-4B (Georgia), P-5, & P-9

Description of Change: Currently, some official BellSouth orders are being reported as part of the Retail Design Analog, when they should actually be excluded from these measures. BellSouth proposes to modify the code to exclude these official BellSouth orders consistent with the SQM. This proposed change was Item (5) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5560)

Impact of Change: For May 2004, in Georgia PMIA, the Retail Design result would increase by 0.13% and the Residence Business Design would increase by .01%.

(6) *Affected Measures:* P-6B (Louisiana only)

Description of Change: Currently, the MSA level reports for this measure are reporting the data for Local Number Portability (LNP) in all disaggregations shown. PMAP is also generating extra disaggregations including INP Standalone, LNP Standalone and No Number Portability. BellSouth proposes to discontinue these extra disaggregations and the repetition of data. This proposed change was Item (6) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5592)

Impact of Change: None.

M&R Measurements

(7) *Affected Measures:* MR-2

Description of Change: Currently, BellSouth includes the circuit identifier for the SLC (pair gain) digital pipe, in the line count for retail DS1 service. These circuit identifiers represent BellSouth internal circuits, which should be excluded from the retail line count. For clarification, the individual services riding within the SLC digital pipe are being properly assigned to the appropriate line count. BellSouth proposes to exclude these internal records consistent with the SQM. This proposed change was Item (7) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5435)

Impact of Change: For June 2004, the DS1 retail analog Customer Trouble Report Rate will be increased by the following percentages:

<u>State</u>	<u>% Increase</u>
Alabama	0.19%
Florida	0.42%
Georgia	0.46%
Kentucky	0.21%
Louisiana	0.31%
Mississippi	0.16%
North Carolina	0.20%
South Carolina	0.97%
Tennessee	0.26%

(8) *Affected Measures:* MR-2

Description of Change: Currently, BellSouth includes some records that are pseudo circuits used for billing purposes only. BellSouth proposes to exclude such records

consistent with the SQM. This proposed change was Item (8) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5517)

Impact of Change: For June 2004, in Georgia, the Design BellSouth Customer Trouble Report Rate would increase by 0.03% and the Georgia BellSouth Business, Residence and Design Customer Trouble Report Rate would increase by 0.01%.

- (9) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently, the first wire center listed on the record determines the state in which to assign a trouble report for these measures. BellSouth proposes to use the last wire center serving the terminating circuit point as the wire center in which the trouble is located. This wire center is the one that serves the end users facility, which is a more accurate location for facility troubles. (RQ5518)

Impact of Change: For May 2004, a total of 68 lines would be reported in a different state from where they were reported.

Billing Measurements

- (10) *Affected Measures:* B-10 (Florida and Tennessee only)

Description of Change: Currently, escalated Billing Adjustment Requests (BARs) are not included in the calculation of this measure. BellSouth proposes to include the interval from the receipt to the point of escalation as the interval for these records and to include these items in the calculation of the measure. This proposed change was Item (9) on the Preliminary October Data Notification filed on August 2, 2004. (RQ5358)

Impact of Change: For June 2004, 3002 of 51,218 (5.86%) total Billing Adjustment Requests (BARs) received were in escalated status.

549060

PRELIMINARY NOVEMBER 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the November 2004 data month. Results for the November 2004 data month will be posted as follows:

Preliminary results	December 20, 2004
Final results	December 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Provisioning Measurements

(1) *Affected Measures:* P-9 (Florida and Tennessee)

Description of Change: Currently, Retail Residence and Business POTS, excluding Switch Based Non-Dispatch data, ≥ 10 Circuits, is not being populated on the One Month Aggregate report in Tennessee and Florida when the CLEC volume is zero. BellSouth proposes to populate the Retail Analog for this disaggregation in all cases. (RQ5521)

Impact of Change: BellSouth will begin reporting the data.

(2) *Affected Measures:* P-3 & P-12

Description of Change: Currently, if a service order that is completed on time is inadvertently assigned a missed appointment code, the order is being counted as a missed appointment. BellSouth proposes to only count missed appointments in cases where

there is a valid missed appointment code on the order and the order was completed after the original committed due date. (RQ5613)

Impact of Change: For May 2004, in Florida, the average missed appointment rate across all products decreased by 0.03% for retail and 0.02 % for CLECs.

M&R Measurements

- (3) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently, the field in LMOS used to identify the company to which troubles are assigned is not updated promptly. In some cases, this causes BellSouth Retail Troubles to be assigned to a CLEC. Bellsouth proposes to identify the company for trouble assignment using another field in LMOS that is updated promptly when a customer moves from a CLEC to BellSouth. (RQ5595)

Impact of Change: For May 2004 data, in Georgia, the CLEC Customer Trouble Report Rate would be reduced by the following amounts: Resale Residence – Dispatch, 0.55%, Non Dispatch, 0.34%; Resale Business-Dispatch 0.14%, Non Dispatch 0.06%. Retail results would increase by less than .01%.

- (4) *Affected Measures:* MR-2

Description of Change: Currently, for Resale line count, BellSouth uses a file that gives a snapshot of lines in service at the end of the month. This snapshot does not reflect adjustments to the line count that are made during the process of closing the books for the month. BellSouth proposes to use a feed that reflects this final line count after the books are closed. (RQ5673)

Impact of Change: For June 2004, the data for Georgia Customer Trouble Report Rate would be reduced by the following amounts:

<u>CLEC</u>	
Residence	-0.59%
Business	-0.44%
PBX	-0.04%
Centrex	-0.44%
Residence & Business (POTS)	-0.76%

Other Measurements

(5) *Affected Measures:* All

Description of Change: BellSouth proposes to remove the Wholesale Company Key and Description (where applicable) from the SDF and OSDF Files. These fields are not used to replicate data. (RQ5352)

Impact of Change: No impact to results

549061

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2004, a copy of the foregoing document was served on the following parties, via the method indicated:

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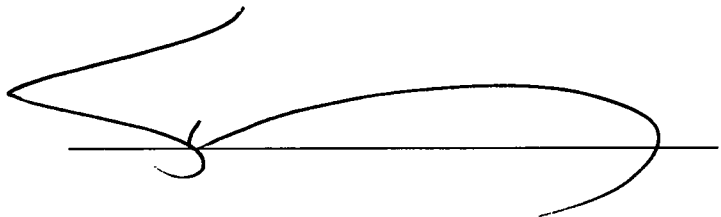
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A handwritten signature in black ink, appearing to be 'Dana Shaffer', written over a horizontal line.